

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ANGELA PETTUS, et al.)
Plaintiffs,)
v.)
THE SERVICING COMPANY, LLC, et al.)
Defendants.)
CIVIL ACTION NO. 3:15cv00479-HEH

DEFENDANTS' RULE 26(a)(1) DISCLOSURES

Defendants The Servicing Company, LLC (“**TSC**”) and Barbara Dolan (“**Ms. Dolan**”) (collectively, “**Defendants**”), by and through undersigned counsel, and subject to their previously filed Motion to Dismiss, submit these initial disclosures pursuant to Rule 26(a)(1).

Rule 26(a)(1)(A)(i) Disclosures – Persons Who May Have Knowledge.

Based on the information reasonably available to Defendants at this time, Defendants believe that the following individuals may have discoverable information regarding the facts that Defendants may use to support their defenses:

1. Barbara Dolan
President, TSC
To be contacted through counsel

Ms. Dolan has knowledge regarding, amongst other things, TSC's organizational structure, business operations, policies and procedures, its relationship with Clarity, the information transmitted between Clarity and TSC, and TSC's relationship with Island Finance.

2. Michelle Fox
CEO, Island Finance
To be contacted through counsel

Ms. Fox is believed to have knowledge regarding TSC's relationship with Island Finance, the critical services performed by TSC for Island Finance, as well as issuing of adverse action notices by Island Finance.

3. Eugene Burke
Data Analyst, Access Financial
To be contacted through counsel

Mr. Burke is believed to have knowledge regarding, amongst other things, Clarity's site visit to TSC. Mr. Burke is also believed to have knowledge regarding Clarity's products and services.

4. Paul Mitchell
Sales Representative, Clarity Services
15550 Lightwave Drive, Suite 350
Clearwater, FL 33760
pmitchell@clarityservices.com
917-992-2577

Mr. Mitchell is believed to have knowledge regarding, amongst other things, Clarity's relationship with TSC and the entry into the end-user agreement between TSC and Clarity. Mr. Mitchell may also have knowledge regarding the rules/criteria required by TSC (using Island Finances's guidelines) in order to purchase a lead.

5. George Self
Clarity Services (believed to be a former employee)

Mr. Self is believed to have knowledge regarding, amongst other things, Clarity's relationship with TSC and the data outputs provided to TSC by Clarity.

6. Erin Wilder
Senior Account Executive, Clarity Services
EleBlanc@clarityservices.com
727-400-6753

Ms. Wilder is believed to have knowledge regarding TSC's relationship with Clarity.

7. Round Sky
848 N. Rainbow Blvd. #326
Las Vegas, NV 89107

Round Sky is believed to have knowledge regarding Ms. Pettus's application as it was the lead source from which Ms. Pettus's information came to TSC.

8. Lead Flash
6700 Broken Sound Parkway
Boca Raton, FL 33487
Lead Flash is believed to have knowledge regarding Ms. Campbell's application as it was the lead source from which Ms. Campbell's information came to TSC.

9. ClickSpeed
10901 Lowell Ave
Oakland Park, KS 66210
(913) 383-1500

ClickSpeed is believed to have knowledge regarding Mr. Mwethuku's application as it was the lead source from which Mr. Mwethuku's information came to TSC.

Rule 26(a)(1)(A)(ii) Disclosures – Categories of Documents

Subject to and without waiving any claim of privilege, the following categories of documents may be used to support the Defendants' defenses in this matter:

1. Agreements between TSC and Clarity.
2. Database outputs and system notes, either internal to TSC, or regarding communications between TSC, Clarity, and various lead generators, regarding the three named Plaintiffs.
3. Adverse action notices to Ms. Pettus and Ms. Campbell from White Hills Cash.

Defendants reserve the right to rely upon documents produced by other parties in this matter, as well as additional documents that may subsequently come to the attention of Defendants or their counsel, or the significance of which may subsequently become apparent to Defendants or their counsel.

Rule 26(a)(1)(A)(iii) Disclosures - Damages.

Not applicable.

Rule 26(a)(1)(A)(iv) Disclosures - Insurance

Not applicable.

THE SERVICING COMPANY, LLC and
BARBARA DOLAN

By Counsel

/s/ Thomas J. McKee, Jr.

Michael R. Sklaire (Va. Bar No. 74354)
Thomas J. McKee, Jr. (Md. Bar No. 68427)
GREENBERG TRAURIG LLP
1750 Tysons Blvd Ste 1000
McLean, VA 22102
Phone: (703) 749-1300
Fax: (703) 749-1301
Email: sklairem@gtlaw.com
mckeet@gtlaw.com

Robert J. Herrington, Esq. (to be admitted
pro hac vice)
GREENBERG TRAURIG LLP
1840 Century Park E Ste 1900
Los Angeles, CA 90067
Phone: (310) 586-7616
Fax: (310) 586-7800
Email: herringtonr@gtlaw.com

*Attorneys for Defendants The Servicing
Company, LLC and Barbara Dolan*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of November 2015, I served a copy of the foregoing via e-mail and via US Mail, first class postage prepaid upon:

James W. Speer
Virginia Bar No. 23046
Virginia Poverty Law Center
919 E. Main Street, Suite 610
Richmond, VA 23219
Telephone: (804) 782 9430
Facsimile: (804) 649-0974
Email: jay@vplc.org

Leonard Anthony Bennett
Virginia Bar No. 37523
Consumer Litigation Associates
763 J Clyde Morris Boulevard, Suite 1A
Newport News, VA 23601
Telephone: (757) 930-3660
Facsimile: (757) 930-3662
Email: lenbennett@clalegal.com

Kristi Cahoon Kelly
Virginia Bar No. 72791
Andrew J. Guzzo
Virginia Bar No. 82170
Kelly & Crandall, PLC
4084 University Drive, Suite 202A
Fairfax, VA 22030
Telephone: (703) 424-7572
Facsimile: (703) 591-0167
Email: kkelly@kellyandcrandall.com
Email: aguzzo@kellyandcrandall.com

/s/ Thomas J. McKee, Jr.
Michael R. Sklaire (Va. Bar No. 74354)
Thomas J. McKee, Jr. (Md. Bar No. 68427)
GREENBERG TRAURIG LLP
1750 Tysons Blvd Ste 1000
McLean, VA 22102
Phone: (703) 749-1300
Fax: (703) 749-1301
Email: sklairem@gtlaw.com
mckeet@gtlaw.com

Attorneys for Defendants The Servicing Company, LLC and Barbara Dolan